

In re

JOANN, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Hearing Date: August 14, 2025 at 10:00 am (ET)

Objection Deadline: August 7, 2025 at 4:00 pm (ET)

NOTICE OF MOTION OF CRAFTY (AL) LLC FOR ENTRY OF AN ORDER: (I) REQUIRING PAYMENT OF ADMINISTRATIVE CLAIM FOR UNPAID PRORATED 2025 REAL ESTATE TAXES; (II) COMPELLING PAYMENT OF CLAIM FOR REMOVAL OF IMPROPERLY “ABANDONED” PROPERTY AS EITHER AN ADMINISTRATIVE EXPENSE CLAIM AGAINST THE DEBTORS AND/OR LIABILITY OF PURCHASER; AND (III) GRANTING RELATED RELIEF

TO: (A) COUNSEL FOR THE ABOVE-CAPTIONED DEBTORS; (B) THE OFFICE OF THE UNITED STATES TRUSTEE FOR THE DISTRICT OF DELAWARE; (C) COUNSEL TO THE PREPETITION TERM LOAN AGENT; (D) COUNSEL TO THE PREPETITION ABL AGENT; (E) COUNSEL TO THE PREPETITION FILO AGENT; (F) COUNSEL TO THE COMMITTEE; AND (G) ALL PARTIES LISTED IN THE CORE/2002 SERVICE LIST AS OF THE DATE HEREOF

PLEASE TAKE NOTICE that on July 29, 2025, CRAFTY (AL) LLC (“**Landlord**”) filed the attached *Motion of CRAFTY (AL) LLC for Entry of an Order: (I) Requiring Payment of Administrative Claim for Unpaid Prorated 2025 Real Estate Taxes; (II) Compelling Payment of Claim for Removal of Improperly “Abandoned” Property as Either an Administrative Expense Claim Against the Debtors and/or Liability of Purchaser; and (III) Granting Related Relief* (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that objections and responses, if any, to the Motion, must be filed on or before August 7, 2025, at 4:00 pm (Eastern Time) (the “**Objection Deadline**”) with the Court, 824 North Market Street, Third Floor, Wilmington, Delaware 19801. At the same time, you must serve a copy of the response on the undersigned counsel so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on August 14, 2025, at 10:00 am (Eastern Time) before the Honorable Craig T. Goldblatt in the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Third Floor, Courtroom 7, Wilmington, Delaware 19081.

¹ The debtors (the “**Debtors**”) in these chapter 11 cases together with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, OH 44236.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Respectfully submitted,

Dated: July 30, 2025
Wilmington, Delaware

DORSEY WHITNEY (DELAWARE) LLP

/s/ Gregory W. Werkheiser

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- and -

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